

Salter & Company P.A.L.L.C.
Certified Public Accountants

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1629 K STREET, NW
WASHINGTON, DC 20006-1631
Telephone 202 223-2680 Facsimile 202 223-3241

RECEIVED
FEDERAL
OPERATIONS CENTER

2005 JAN -1 A 1 55

January 3, 2005

Elizabeth Boody
Campaign Finance Analyst
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Ms. Boody:

Our client, United Association Political Education Committee (UAPEC), has instructed us to reply to your notice dated December 23, 2004. We have enclosed a copy of that notice for your convenience.

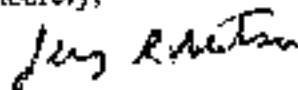
The following actions have been taken by the UAPEC in response to your notice:

1. The contribution to Bryan Kennedy for Congress has been redesignated to the 2004 General Election. Notice to the Kennedy campaign is attached.
2. The \$1,800 excess contribution to Friends of Tim Holden for Congress has been requested to be refunded by the campaign. Notice to the Holden campaign is attached.
3. The \$6,000 excess contribution to Broomfield for Congress has been requested to be refunded by the campaign. Notice to the Broomfield campaign is attached.
4. The \$1,000 excess contribution to Betty Castor for Senate has been requested to be refunded by the campaign. Notice to the Castor campaign is attached.
5. The contribution to King for Congress has been redesignated to the 2004 primary election. Notice to the King campaign is attached.
6. The \$2,500 excess contribution to Al Green for Congress has been requested to be refunded by the campaign. Notice to the Green campaign is attached.

An amended report will be submitted electronically to provide addresses for all contributions made. This is additional support for Line 23.

Please adjust your records to reflect the above information. If you should have any further questions, please do not hesitate to contact me.

Sincerely,



Jerome J. Robertson, CPA

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

RQ-2

December 23, 2004

Martin J. Maddaloni, Treasurer
United Association Political Education Committee
901 Massachusetts Avenue NW
Washington, DC 20001

Response Due Date:
January 24, 2005

Identification Number: C00012476

Reference: October Monthly Report (9/1/04-9/30/04)

Dear Mr. Maddaloni:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. An adequate response must be received at the Commission by the response date noted above. An itemization of the information needed follows:

-Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the 2004 Primary election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

DEC 27 2004

UNITED ASSOCIATION POLITICAL EDUCATION COMMITTEE
PAGE 2

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

UNITED ASSOCIATION POLITICAL EDUCATION COMMITTEE
PAGE 3

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

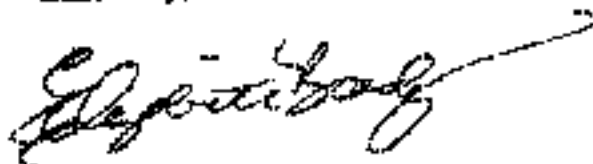
-Please amend Schedule B supporting Line 23 by providing the address for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Administrative expenses, such as salary, should be properly disclosed on a separate Schedule B, supporting Line 21(b) of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing.

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1686.

Sincerely,



Elizabeth Boody
Campaign Finance Analyst
Reports Analysis Division

UNITED ASSOCIATION POLITICAL EDUCATION COMMITTEE
PAGE 4

Recipient Name	Date	Amount	Election	Election State - Date
Bryan Kennedy for Congress	9/30/04	\$5,000.00	2004 Primary	WI - 9/14/04

Recipient Name	Date	Amount	Election	Report	Contributing Affiliates
Friends of Congressman Tim Holden	4/23/04	\$1,800.00	2004 General	2004 July Quarterly	United Association of Steam/Pipefitters Local Union 524 Political Action Fund
Friends of Congressman Tim Holden	9/2/04	\$5,000.00	2004 General	2004 October Monthly	United Association Political Education Committee
Broomfield for Congress	9/30/04	\$1,000.00	2004 General	2004 October Quarterly	Pipefitters Local #533 Volunteer Political Fund
Broomfield for Congress	5/21/04	\$5,000.00	2004 General	2004 June Monthly	United Association Political Education Committee
Broomfield for Congress	9/30/04	\$5,000.00	2004 General	2004 October Monthly	United Association Political Education Committee
Betty Castor for Senate	2/19/04	\$1,000.00	2004 General	2004 April Quarterly	Plumbers & Pipefitters Local Union No. 295 PAC
Betty Castor for Senate	9/30/04	\$5,000.00	2004 General	2004 October Monthly	United Association Political Education Committee
King for Congress	6/29/04	\$5,000.00	2004 General	2004 July Monthly	United Association Political Education Committee
King for Congress	9/2/04	\$5,000.00	2004 General	2004 October Monthly	United Association Political Education Committee
Al Green for Congress	5/31/04	\$2,500.00	2004 General	2004 June Monthly	United Association Political Education Committee
Al Green for Congress	9/30/04	\$5,000.00	2004 General	2004 October Monthly	United Association Political Education Committee



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UNITED ASSOCIATION
of Journeymen and Apprentices of the
Plumbing and Pipe Fitting Industry of
the United States and Canada

General Office File Reference: **LLM**William P. Hite
*General President*Patrick S. Parno
*General Secretary-Treasurer*Stephen S. Kelly
Assistant General President

December 30, 2004

Bryan Kennedy for Congress
823 North 2nd Street, Suite 103
Milwaukee, WI 53203

Gentlemen:

Please be advised that the United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry gave a check for \$5,000.00 to Bryan Kennedy for Congress dated September 30, 2004. At this time we are re-designating that check to the General Fund as we have just learned from the Federal Election Commission that we have already given him his maximum contribution for the Primary Fund. Sorry for any inconvenience this may cause.

If you have any questions, please contact Luckie McClintock, Director of Political and Legislative Affairs at (202) 628-5823, ext. 296.

With best wishes, I am

Sincerely yours,

William P. Hite
General President

WPHT:pab



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UNITED ASSOCIATION

of Journeymen and Apprentices of the
Plumbing and Pipe Fitting Industry of
the United States and Canada

General Office Title Reference:

LLAA

William P. Hite
General President

Patrick R. Peneo
General Secretary-Treasurer

Stephen P. Kelly
Assistant General President

December 30, 2004

Tim Holden for Congress
1721 N. Front Street
Harrisburg, PA 17102

Gentlemen:

Please be advised that the United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry gave a check for \$5,000.00 to Tim Holden for Congress dated September 2, 2004. At this time we are requesting \$1,800.00 of the money back as we have just learned from the Federal Election Commission that we have given Mr. Holden \$1800.00 over his maximum contribution per election cycle. Sorry for any inconvenience this may cause.

If you have any questions, please contact Luckie McClintock, Director of Political and Legislative Affairs at (202) 628-5823, ext. 296.

With best wishes, I am

Sincerely yours,

William P. Hite
General President

WPH:pab

**UNITED ASSOCIATION**

of Journeymen and Apprentices of the
Plumbing and Pipe Fitting Industry of
the United States and Canada

Founded 1889

General Office File Reference:

LLM

William P. Hite
General President

Patrick R. Foster
General Secretary-Treasurer

Stephen R. Kelly
Assistant General President

December 30, 2004

Charles Broomfield for Congress
PO Box 681068
Riverside, MO 64168

Gentlemen:

Please be advised that the United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry gave a check for \$5,000.00 to Charles Broomfield for Congress dated September 30, 2004 and Local Union 533 gave a \$1,000.00 check dated September 30, 2004. At this time we are requesting \$6,000.00 of the money back as we have just learned from the Federal Election Commission that we have given Mr. Broomfield \$6,000.00 over his maximum contribution per election cycle. Sorry for any inconvenience this may cause.

If you have any questions, please contact Luckie McClintock, Director of Political and Legislative Affairs at (202) 628-5823, ext. 296.

With best wishes, I am

Sincerely yours,

William P. Hite
General President

WPH:pab



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UNITED ASSOCIATION
of Journeymen and Apprentices of the
Plumbing and Pipe Fitting Industry of
the United States and Canada

General Office File Reference:

LLM

William P. Hite
General President

Patrick R. Pomeroy
General Secretary-Treasurer

Stephen E. Kelly
Assistant General President

December 30, 2004

Betty Castor for Senate
PO Box 18045
Tampa, FL 33679

Gentlemen:

Please be advised that the United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry gave a check for \$5,000.00 to Betty Castor for Senate dated September 30, 2004. At this time we are requesting \$1,000.00 of the money back as we have just learned from the Federal Election Commission that we have given Mrs. Castor \$1,000.00 over her maximum contribution per election cycle. Sorry for any inconvenience this may cause.

If you have any questions, please contact Luckie McClintock, Director of Political and Legislative Affairs at (202) 628-5823, ext. 296.

With best wishes, I am

Sincerely yours,

William P. Hite
General President

WPH:pah

LLA

September 29, 2004

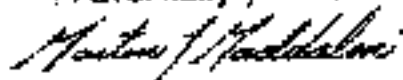
Gary King for Congress
Box 2718
Mesilla Park, NM 88047

Dear Sir and Brother:

Please be advised that the United Association of Plumbers and Pipe Fitters gave a check for \$5,000.00 to Gary King for Congress on June 29, 2004 for your General Election. At this time we are re-designating that check to the Primary Fund as we have just learned that we have already given him his maximum contribution for the General Election. Sorry for any inconvenience this may have caused.

If you have any additional questions, please contact us.

Fraternally yours,



Martin J. Maddaloni
General President

Enclosure

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**UNITED ASSOCIATION**

of Journeymen and Apprentices of the
Plumbing and Pipe Fitting Industry of
the United States and Canada

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General Office File Reference:

LLM

William P. Hite
General President

Patrick R. Derno
General Secretary-Treasurer

Stephen J. Kelly
Assistant General President

December 30, 2004

Al Green for Congress
3003 S. Loop West, Suite 420
Houston, TX 77054

Gentlemen:

Please be advised that the United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry gave a check for \$5,000.00 to Al Green for Congress dated September 30, 2004. At this time we are requesting \$2,500.00 of the money back as we have just learned from the Federal Election Commission that we have given Mr. Green \$2,500.00 over his maximum contribution per election cycle. Sorry for any inconvenience this may cause.

If you have any questions, please contact Luckie McClintock, Director of Political and Legislative Affairs at (202) 628-5823, ext. 296.

With best wishes, I am

Sincerely yours,

William P. Hite
General President

WPH:pab

Federal Election Commission
**ENVELOPE REPLACEMENT PAGE
 FOR INCOMING DOCUMENTS**

The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> USPS First Class Mail	Postmarked 1/3/05
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
Delivery Confirmation™ Label <input type="checkbox"/>	
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
JMD PREPARER (5/2004)	1/7/05 DATE PREPARED